

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

SCOTT TRAUDT,)
Plaintiff,)
)
v.) Case No. 2:24-cv-782
)
ARI RUBINSTEIN,)
GTS SECURITIES LLC,)
GTS EQUITY PARTNERS LLC,)
GTS EXECUTION SERVICES LLC,)
CHARLES W. SCHWAB AND CO. INC.,)
SCHWAB HOLDINGS, INC.,)
FINANCIAL INDUSTRY REGULATORY)
AUTHORITY,)
Defendants,)
)
GARY GENSLER,)
US SECURITIES AND EXCHANGE)
COMMISSION,)
Respondent)
)

**CHARLES SCHWAB & CO., INC. AND SCHWAB HOLDINGS, INC.'S
RESPONSE TO PLAINTIFF'S MOTION FOR EXTENSION OF TIME**

Defendants Charles Schwab & Co., Inc. and Schwab Holdings, Inc. (collectively, “Schwab”) submit this response to Plaintiff Scott Traudt’s (“Plaintiff”) Motion for Extension of Time to Respond (Dkt. No. 45) (“Motion”) to clarify certain statements made in the Motion.

On Saturday, September 14, 2024, Plaintiff contacted counsel for Schwab via email seeking “a few extra days” in order to respond to Schwab’s Motion to Stay in Favor of Arbitration (Dkt. No. 8). *See* Declaration of Jeff Goldman, Esq. in Support of Schwab’s Response to Plaintiff’s Motion for Extension of Time (“Goldman Decl.”),

¶ 3 & Ex. 1. Plaintiff stated that he needed additional time because he discovered that certain customer service messages between himself and TD Ameritrade were no longer available on his account. Goldman Decl. Ex. 1. Attorney Jeff Goldman responded that Schwab was amenable to a short extension of time for Plaintiff to file his opposition if Schwab's responsive pleading deadline was extended by the same number of days. *Id.* Contrary to Plaintiff's assertion, Attorney Goldman never "refused" an extension of time. Schwab remains willing to allow Plaintiff to have until September 20, 2024 to respond to Schwab's motion, so long as its responsive deadline is similarly extended three days, to October 10, 2024.

DATED at Burlington, Vermont, this 18th day of September 2024.

By: /s/ Justin B. Barnard

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*Counsel for Charles Schwab & Co., Inc. and
Schwab Holdings, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2024, the foregoing document is being filed through the CM/ECF system and that a copy of the same will be sent electronically to all registered participants. A paper copy of the foregoing document will also be sent to the Plaintiff, at the address stated on his Complaint.

/s/ Justin B. Barnard

Justin B. Barnard